

## **HASQARD Focus Group**

### **Meeting Minutes**

August 23, 2016

The meeting was called to order by Jonathan Sanwald, HASQARD Focus Group Chair at 2:05 PM on August 23, 2016 in Conference Room 308 at 2420 Stevens.

Those attending were: Jonathan Sanwald (Mission Support Alliance (Mission Support Alliance (MSA)), Focus Group Chair), Cliff Watkins (Corporate Allocation Services, DOE-RL Support Contractor, Focus Group Secretary), Taffy Almeida (Battelle - Pacific Northwest National Laboratory (PNNL)), Marcus Aranda (Wastren Advantage Inc. Wastren Hanford Laboratory (WHL)), Jeff Bramson (CH2M HILL Plateau Remediation Company (CHPRC)), Glen Clark (Washington River Protection Solutions (WRPS)), Jim Douglas (CHPRC), Fred Dunhour (DOE – Office of River Protection), Scot Fitzgerald (CHPRC), Jessica Joyner (WRPS), Joan Kessner (Washington Closure Hanford (WCH)), Sarah Nagel (CHPRC), Noe'l Smith-Jackson (Washington State Department of Ecology), Chris Sutton (CHPRC), Wendy Thompson (MSA), Rich Weiss (WCH).

- I. Because there were some new HASQARD Focus Group meeting attendees in the room, Jonathan Sanwald requested all attendees to introduce themselves and state their affiliation with the group.
- II. Because it was the last regularly scheduled HASQARD Focus Group meeting before the end of the WCH contract, a thank you celebration was held in honor of the contributions Joan Kessner and Rich Weiss have made to the development, maintenance and interpretation of HASQARD since its inception.
- III. Jonathan Sanwald requested review and approval of the meeting minutes from the last quarterly meeting of the HASQARD Focus Group held on April 19, 2016. Hearing no comments on the draft meeting minutes, the minutes were approved.
- IV. The status of action items from the May 26, October 22, January 26 and April 19 meetings were discussed:
  - a. Jonathan Sanwald stated he has worked with Rich Weiss to complete a first draft audit checklist for HASQARD Rev. 4. Jonathan said the checklist he has in draft contains notations provided by Rich Weiss showing gaps between HASQARD requirements and the DOECAP Quality System Manual (QSM). The checklists Jonathan has prepared showing the gaps pertain only to HASQARD Volumes 1 and 4. This was the initial focus because the DOECAP has no purview over the requirements found in HASQARD Volumes 2 and 3. Someone asked if

audit checklists for HASQARD Rev. 3 Volumes 2 and 3 exist anywhere. Rich stated he believes they do and he will look for them before his last day. Jeff Bramson stated he could use one for an upcoming assessment planned of the groundwater sampling program, but he did not know of anyone at CHPRC that might have an applicable checklist based on HASQARD requirements. Chris Sutton stated that he recalled seeing a checklist based on HASQARD Volume 2 in the past. Wendy Thompson also mentioned she has an assessment of sampling coming up for MSA next fiscal year and could use a checklist based on HASQARD Volume 2. Jonathan Sanwald said he will send an electronic copy of the checklist showing gaps with DOECAP when the draft meeting minutes are distributed for comments. Jonathan said he would like feedback on these checklists as soon as possible so he could begin using them in future audits of on-site laboratories. The color coding on the draft checklists that will be sent out was explained. Green highlighting denotes a new requirement in HASQARD between Revision 3 and Revision 4. Jonathan also mentioned the line item numbers on the draft checklists are not accurate yet. The numbers reflect numbering found in Revision 3 of HASQARD and may have changed in Revision 4. Jonathan is hoping comments will be received quickly so he can have them addressed before the next HASQARD meeting scheduled for October 18, 2016.

- b. The relationship of the DOECAP, HASQARD and the MSA Acquisition Verification Services (AVS) laboratory services Evaluated Suppliers List (ESL) was discussed.

Jonathan Sanwald began this discussion describing a meeting held on July 9, 2016 between Steve Chalk (DOE-RL QA Team Lead), Fred Dunhour, Jeff Cheadle, Jonathan Sanwald, Cliff Watkins, George Mata (MSA QA) and Chris Sutton to discuss the issues related to laboratory supplier evaluations being performed by MSA AVS. An issue has arisen where MSA AVS is not allowing statements of work (SOWs) to commercial laboratories be written with HASQARD referenced. This has led to CHPRC receiving an audit finding from their corporate office because it appears they are not flowing down requirements stated in HASQARD to commercial laboratories (i.e., that HASQARD is applicable). George Mata explained his position and referenced a letter written by MSA to DOE in February 2011. In this letter MSA described the communication from DOE-HQ directing all field office to participate in DOECAP (or its predecessor, EMCAP) and prohibiting performance of duplicative audits. In June 2011, DOE-RL responded to the request with concurrence that MSA utilize DOECAP audits “to ensure that commercial laboratories used to obtain analytical results for environmental samples meet applicable sample management and analytical services quality assurance requirements.” The letter from RL also includes the statement, “Be advised however that this direction does not relieve MSA of its

contractual responsibility to ensure that all regulatory quality assurance requirements for environmental data are met.” George Mata’s position is that HASQARD is not a “regulatory quality assurance requirement.” Rather, use of HASQARD is a contractual requirement. Also, George believes that referencing a quality assurance requirements document (i.e., HASQARD) in a SOW to laboratories that are being audited and approved using a separate quality assurance standard (i.e., the DOECAP QSM) would add undue confusion and duplicative requirements. As a result of this position, CHPRC has placed individual QA criteria from HASQARD in their SOWs with no reference to the entirety of HASQARD as a requirement. The group assembled at the July 9 meeting felt that this issue would be satisfied if the statements in the Introduction and/or Scope sections of HASQARD clarified that HASQARD is not applicable to subcontracted commercial laboratory services. If that were done, the contractual requirement to use HASQARD could be met by its use at the on-site laboratory(ies), for field sampling and for field analyses without imposing a requirement that would conflict with effective use of the DOECAP as the auditing organization responsible for commercial laboratory audits.

After presenting a summary of the July 9 meeting to the Focus Group, Chris Sutton reiterated the issue he is facing trying to determine appropriate corrective actions for the finding incurred from a CH2MHILL corporate audit team for not flowing down HASQARD by reference into SOWs CHPRC uses to obtain commercial laboratory services.

Jonathan Sanwald stated that his initial understanding from working with the HASQARD Focus Group was that DOECAP and HASQARD requirements were both being evaluated at commercial laboratories during DOECAP audits. This was being done by a representative from Hanford, serving as a DOECAP audit team member, using a gap checklist to evaluate lines of inquiry that DOECAP does not address. Jonathan stated that he recently participated in a DOECAP audit at Test America in Richland and found that this was not the case. At the Test America DOECAP audit, nobody on the DOECAP audit team addressed anything other than the DOECAP audit criteria. Glen Clark stated that the gap analysis is often done as a desk review of procedures and other documentation provided by the laboratory at a separate time. It was stated that there is not enough time to complete both the DOECAP and HASQARD gap audit unless the Hanford representative allows for an extra day at the laboratory. Taffy Almeida stated that PNNL has spent an extra day at the laboratory while serving as a DOECAP auditor to examine the additional HASQARD requirements. Wendy Thompson asked if anyone knew what the gaps between HASQARD and DOECAP are. She would like to have them identified for future assessments she may be doing. Glen Clark stated that most of the differences between HASQARD

and the DOECAP QSM are administrative in nature allowing for most to be evaluated in a desk review.

Noel Smith-Jackson asked if a change to the Tri-Party Agreement (TPA) to specifically require use of HASQARD would provide the regulatory basis to ensure HASQARD was used by all laboratories (i.e., on-site and commercial). One of the Focus Group members stated that use inclusion in the TPA would not necessarily result in all environmental samples being covered because many samples are collected and analyzed for purposes other than TPA work.

Jonathan Sanwald stated that the current situation makes auditing difficult because DOECAP audits are perceived as being required by RL direction and there is no time during a DOECAP audit to evaluate the different requirements that may be present in a site-specific SOW such as those being prepared by CHPRC to ensure HASQARD requirements are flowed down without specific mention of HASQARD in the SOW.

Sarah Nagel stated that one of the lines of inquiry included in DOECAP audits is how are client-specific requirements addressed by the laboratory being audited by DOECAP.

Wendy Thompson pointed out an example of a known deficiency in the DOECAP audits. Specifically, that DOECAP is focused on analysis of typical environmental sample media (e.g., soil, water, waste, air) and MSA's Environmental Surveillance program collects samples of biota that are normally not evaluated during a DOECAP audit. As a result, she recently sent a separate auditor to the laboratory to assess this type of work. It was stated that HASQARD requirements don't translate to biota samples well except for some of the administrative requirements (e.g., chain of custody, records management).

Rich Weiss stated he remains confused about the issue with incorporating HASQARD in SOWs and using DOECAP audits. Rich asked, would an SOW stating that Appendix A is HASQARD and it applies be rejected by George Mata? Jonathan Sanwald said it would be. Rich stated he does not hear a compelling reason. A DOECAP laboratory audit and assessing the laboratory's ability to conform to HASQARD are not mutually exclusive. Especially given the nature of the differences. Rich suggests that when the Focus Group reviews the HASQARD Rev. 4 checklists that will be distributed with the draft meeting minutes, the Focus Group determine if any of the identified gaps are considered significant enough to warrant the current scope of HASQARD to remain the same and include all commercial laboratories analyzing Hanford site samples. When reviewing the checklist, the words "not found" are used to indicate requirements that are in HASQARD (and therefore the associated

checklist) that cannot be found in the DOECAP checklists or QSM.

Rich Weiss stated that one of the most notable differences between HASQARD and the DOECAP QSM is that the QSM has no mention of stop work authority. Wendy Thompson asked if laboratories have their own internal stop work policies. Rich and Glen Clark stated that most of them have this in place in their QA programs. Wendy asked how many of the requirements in HASQARD that are not in QSM are critical. Joan Kessner and Rich Weiss stated that this is something the Focus Group will have to decide as they address this matter. Joan Kessner stated that if Hanford decides to relieve commercial laboratories of any obligation to HASQARD, they will likely need to get regulatory approval. Noe'l Smith-Jackson echoed that concern because when she reviews environmental documents (e.g., sampling and analysis plans) that require sample analyses she verifies that HASQARD is specified in the document.

## V. New Business

- a. Chris Sutton mentioned that one of the comments received at the recently completed CH2MHILL corporate audit of the CHPRC sample management organization was that HASQARD Volume 3 should apply to borehole geophysics, aerial fly over gamma spectrometry and resistivity probes for conductive fluids. Jeff Bramson stated that perhaps the “universe” of measurements applicable to HASQARD should be based on the data use. That is, if no decision is being made using the data, then HASQARD is not applicable. One HASQARD Focus Group member asked that if a decision is not being made using a measurement, why is the measurement being made in the first place? Wendy Thompson stated that Volume 3 was developed to support use of field analytical methods in lieu of laboratory analytical methods for environmental work. One driver for development of this document was to define separate protocol and procedures for radiation measurements made for environmental characterization purposes from those used by health physics professionals for personnel monitoring. Wendy added that for many projects, for example at the 618-10 Burial Ground, the downhole geophysics methods were project specific procedures developed with HASQARD in mind and were specified in the sampling and analysis plan (SAP). The SAP stated work was performed in accordance with HASQARD and any exceptions were noted in the procedures. Joan Kessner stated that HASQARD Volume 3 was developed to describe what was being done at the time of the first version of Volume 3. Joan stated that the EPA documents on field screening are still available. The HASQARD Volume 3 was developed to define QA/QC criteria for field measurements. Chris asked if a conscious decision to not include methods such as borehole geophysics, aerial fly over gamma spectrometry and resistivity probes for conductive fluids in Volume 3 was made. Joan and Wendy agreed that no, there was no conscious decision to exclude those methods and/or measurements. Joan Kessner said she would look at Volume 3 to recall what it says, but believes it

was an attempt to describe what was being done at the time it was written. Wendy mentioned that The Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) was issued in draft at about the same time as HASARD Volume 3 providing Hanford specific QA/QC for radiological survey methods that could be referenced and also satisfy specifications in MARSSIM. Issuing HASQARD Volume 3 provided Hanford specific QA/QC requirements for development of environmental remediation sampling designs that relied on radiological surveys to guide remediation work, assess completion of remediation, develop closeout sampling designs, and thereby reduce the number physical samples needed for laboratory analysis.

- b. Rich Weiss mentioned that he has transmitted electronic versions of HASQARD Rev. 0, Rev. 1 and Rev. 2 to the HASQARD Focus Group Secretary in case anyone wants to research the older documents.
- c. Rich Weiss mentioned that the DOECAP QSM Version 5.1 is out for formal review with the goal to have it approved and implemented before the next round of DOECAP audits. In the future, the DOECAP QSM will attempt to conform to the 2009 QA standard published by The National Environmental Laboratory Accreditation Coalition Institute (The NELAC Institute or TNI). In the meantime, the new TNI QA document is scheduled to be issued soon. When the next TNI QA standard is published, it will impact the DOECAP QSM and therefore the number of gaps between DOECAP and HASQARD. The question was asked, if DOECAP is trying to conform to the TNI documents, why don't they audit directly to those documents and not repeat everything in the QSM? Rich Weiss responded that the TNI documents have copyrights and, as a result, DOECAP has no authority to audit to them directly. If DOECAP audited to the TNI document directly it would give the impression that they in some way represent TNI.
- d. Rich Weiss stated that he has heard DOECAP begin to talk of not doing annual audits at every laboratory. The concept being discussed is that certain laboratories would be allowed to conduct "self-assessments" of their compliance with DOECAP. The DOECAP personnel would then review the results of the self-assessment. If this is implemented by DOECAP, a scenario could come about where nobody has physically been to a laboratory in a few years. This could create compliance issues for some DOECAP users if audit frequencies are not being met. Someone in the group asked if they knew why DOECAP was considering this. Rich speculated that it was a matter of not enough qualified resources being available to support the audits required, the fact that this has worked for the Treatment Storage and Disposal Facilities that DOECAP also audits, financial reason and the fact that DOECAP auditors don't see much change from year to year as they return to the same laboratory.

Hearing no additional new business, the Focus Group Chair adjourned the meeting at 3:17 PM. The next meeting of the HASQARD Focus Group will be October 18, 2016 in Conference Room 308 at 2420 Stevens.